

BRETT A. AXELROD, ESQ.
Nevada Bar No. 5859
NICHOLAS A. KOFFROTH, ESQ.
Nevada Bar No. 16264
ZACHARY T. WILLIAMS, ESQ.
Nevada Bar No. 16023
FOX ROTHSCHILD LLP
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
Telephone: (702) 262-6899
Facsimile: (702) 597-5503
Email: baxelrod@foxrothschild.com
nkoffroth@foxrothschild.com
zwilliams@foxrothschild.com
Counsel for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**STIPULATION TO EXTEND
FIRST AMENDED PLAN VOTING
DEADLINE FOR SECURED
CREDITORS**

Cash Cloud, Inc. dba Coin Cloud (“Debtor”), debtor and debtor in possession in the above-captioned case (the “Chapter 11 Case”), by and through its counsel Fox Rothschild LLP; Genesis Global Holdco, LLC (“Genesis”), by and through its counsel Cleary Gottlieb Steen & Hamilton LLP and Snell & Wilmer L.L.P.; Enigma Securities Limited (“Enigma”), by and through its counsel Morrison & Foerster LLP and Shea Larsen; AVT Nevada, L.P.(“AVT”), by through its counsel Michael Best & Friedrich LLP, and the Official Committee of Unsecured Creditors (the “Committee” and together with the Debtor, Genesis, Enigma, AVT and the Committee, the “Parties”), by and through its counsel Seward & Kissel LLP and McDonald Carano, LLP, stipulate and agree as follows (the “Stipulation”):

RECITALS

A. WHEREAS, on February 7, 2023, Debtor filed a voluntary petition under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Nevada (the “Court”), commencing the Chapter 11 Case;

B. WHEREAS, on May 28, 2023, the Debtor filed its *Chapter 11 Plan of Reorganization dated May 8, 2023* [ECF No. 528] (the “Plan”) and its *Disclosure Statement for Chapter 11 Plan of Reorganization dated May 8, 2023* [ECF No. 529] (the “Disclosure Statement”);

C. WHEREAS, on August 1, 2023, Debtor filed its *First Amended Chapter 11 Plan of Reorganization Dated August 1, 2023* [ECF No. 996], which extended the Plan Voting Deadline to August 8, 2023 at 5:00 p.m. (Pacific Time), for Secured Creditors only; and

D. WHEREAS, the Parties have agreed to extend the Plan Voting Deadline for Genesis, Enigma and AVT to August 8, 2023 at 5:00 p.m. (Pacific Time), including with respect to all General Unsecured Claims (as defined in the Plan) held by Genesis;

NOW, THEREFORE, the Parties hereby stipulate and agree to the following:

IT IS STIPULATED AND AGREED that:

1. The Plan Voting Deadline for Genesis, Enigma and AVT shall be extended to August 8, 2023 at 5:00 p.m. (Pacific Time), including with respect to all General Unsecured Claims held by Genesis.

Dated this 4th day of August 2023.

FOX ROTHSCHILD LLP

MICHAEL BEST & FRIEDRICH, LLP

By: /s/Brett A. Axelrod
 BRETT A. AXELROD, ESQ.
 Nevada Bar No. 5859
 NICHOLAS A. KOFFROTH, ESQ.
 Nevada Bar No. 16264
 ZACHARY T. WILLIAMS, ESQ.
 Nevada Bar No. 16023
 1980 Festival Plaza Drive, Suite 700
 Las Vegas, Nevada 89135
Counsel for Debtor

By: /s/Justin Mertz
 JUSTIN M. MERTZ, ESQ.
 790 North Water Street, Suite 2500
 Milwaukee, Wisconsin 53202

 and

 ANNE T. FREELAND, ESQ.
 Nevada Bar No. 10777
 2750 East Cottonwood Pkwy., Suite 560
 Cottonwood Heights, UT 84121
Counsel for AVT Nevada, L.P.

SEWARD & KISSEL LLP

By: /s/Catherine V. LoTempio
ROBERT J. GAYDA, ESQ.
CATHERINE V. LOTEMPPIO, ESQ.
ANDREW J. MATOTT, ESQ.
One Battery Park Plaza
New York, NY 10004

and

MCDONALD CARANO, LLP
RYAN J. WORKS, ESQ.
2300 West Sahara Avenue, Suite 1200
Las Vegas, NV 89102
*Counsel for The Official Committee of
Unsecured Creditors*

MORRISON & FOERSTER LLP

By /s/Andrew Kissner
GARY LEE, ESQ.
(Admitted Pro Hac Vice)
New York Bar No. 2397669
ANDREW KISSNER, ESQ.
(Admitted Pro Hac Vice)
New York Bar No. 5507652
250 West 55th Street
New York, New York 10019-3601

and

SHEA LARSEN
JAMES PATRICK SHEA, ESQ.
Nevada Bar No. 405
BART K. LARSEN, ESQ.
Nevada Bar No. 8538
KYLE M. WYANT, ESQ.
Nevada Bar No. 14652
1731 Village Center Circle, Suite 150
Las Vegas, Nevada 89134
Counsel for Enigma Securities Limited

**CLEARY GOTTlieb STEEN &
HAMILTON LLP**

By /s/Michael D. Weinberg
SEAN A. O'NEAL, ESQ.
(Admitted Pro Hac Vice)
MICHAEL D. WEINBERG, ESQ.
(Admitted Pro Hac Vice)
One Liberty Plaza
New York, NY 10006
and
ROBERT R. KINAS, ESQ.
(NV Bar No. 6019)
BLAKELEY E. GRIFFITH, ESQ.
(NV Bar No. 12386)
CHARLES E. GIANELLONI, ESQ.
(NV Bar No. 12747)
SNELL & WILMER L.L.P.
3883 Howard Hughes Pkwy., Suite 1100
Las Vegas, NV 89169
Counsel for Genesis Global Holdco, LLC